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August 3, 2017

Via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Palmer Wireless
E911 Location Accuracy Implementation Plan and Progress Report
PS Docket No. 07-114

Dear Ms. Dortch,

Pursuant to 47 C.F.R. § 20.18(i)(4)(i)-(ii), submitted herewith on behalf of Palmer Wireless, is its E911 location accuracy implementation plan and progress report.

Should you have any questions, please contact undersigned counsel.

Sincerely,

/s/ Michael R. Bennet

Michael R. Bennet

Attachment

4832-8107-7302, v. 1

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

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Wireless E911 Location Accuracy Requirements)

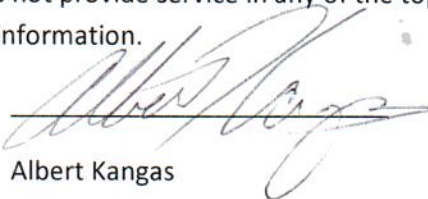
PS Docket No. 07-114

Palmer Wireless E911 Implementation Plan and Initial Progress Report

Palmer Wireless ("Palmer"), pursuant to Section 20.18(i)(4)(i)-(ii) of the Federal Communications Commission's ("FCC" or "Commission") rules, hereby submits its location accuracy implementation plan and initial progress report.

Palmer is a small non-nationwide CMRS carrier providing service in Minnesota. Palmer does not provide service in any of the top 50 CMAs. Palmer entered into a services agreement with West Safety Services ("West") for infrastructure, software and services to enable Palmer to provide enhanced 911 ("E911") location data to E911-capable public safety answering points ("PSAPs"). Palmer has utilized the Location Performance Management ("LPM") tool provided by West to ensure compliance with location accuracy requirement of Section 20.18(i)(2)(i)(B)(1) of the FCC's rules. The LPM allows users to optimize network accuracy and identify areas for improvement. Its performance monitoring and reporting tools identify location performance issues and provide reports that allow for auditing key performance indicators and call results and analyze location server performance. The LPM provides live call data reports, 50 meter accuracy reports, and PSAP reports consistent with ATIS's 05000031 recommendation.

Palmer currently exceeds the 50% location accuracy benchmark which is scheduled to go into effect in April 2018. Palmer has not yet determined whether it will be deploying VoLTE in its network. To the extent it deploys a commercially operating VoLTE platform in its network, and is therefore required to meet the subsequent 70% and 80% accuracy benchmarks, Palmer, through use of the LPM tool, plans on taking whatever additional steps are necessary to achieve the required degree of accuracy. Because Palmer does not provide service in any of the top 50 CMAs, it is not required to provide vertical z-axis location information.



Albert Kangas

Owner

Date: August 2, 2017